



American Cyanamid Company
P.O. Box 262
Michigan City, IN 46360

US EPA RECORDS CENTER REGION 5



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U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION V

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 16, 1983

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WASTE MANAGEMENT BRANCH
EPA REGION V

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Division
U.S. Environmental Protection Agency
Region V, 5HW-13
230 South Dearborn Street
Chicago, IL 60604

Re: Permit Application Withdrawal Letter
American Cyanamid Company - Michigan City Plant
ND 005 159 546 PA, G

Dear Mr. Klepitsch:

This is in response to your letter of June 23, 1983 relative the request to withdraw the RCRA permit application for the Michigan City plant which was previously submitted on November 5, 1982.

On November 14, 1980, American Cyanamid Company's Michigan City plant submitted a Part A RCRA permit application to your office. The application indicated the treatment of corrosive wastes in tanks (T01) and the storage of laboratory quantities of corrosive and mercury-containing wastes in containers (S01).

Since the time of the application, the neutralization of corrosive wastes in tanks has been exempted as outlined in the November 17, 1980 Federal Register (45 FR 76074-76075). Cyanamid therefore requests that the "elementary neutralization exemption" be applied to the neutralization tankage outlined in the application.

Since the time of the application, Cyanamid has also determined that the "small quantity generator" exclusion, 40 CFR 261.5, should be applied to the storage of the hazardous laboratory wastes generated. These wastes are generated in quantities significantly less than 1000 kg/month and are accumulated in containers for subsequent off-site disposal. When and if the total amount of accumulated waste exceeds 1000 kg, it is not stored for more than 90 days. Cyanamid therefore requests that the small quantity generator exclusion be applied to the container storage outlined in the application.

Based on the facts outlined above, Cyanamid requestes withdrawal of the RCRA Part A application for the Michigan City plant. We recognize that in so doing we are surrendering our RCRA interim status for this plant location. We request, however, that the plant RCRA generator identification number, i.e. IND 005 159 546, remain in effect to allow the manifesting of the small quantity shipments.

Certification of the information contained in this RCRA application withdrawal letter is enclosed.

This submission or any past or future discussion or communication with respect to this matter is not intended to admit any liability or to waive or affect any rights.

Very truly yours,

AMERICAN CYANAMID COMPANY



R. V. Toloso
Plant Manager

RVT/nl
08/1758g

Enclosure